

Exhibit 3

From: [Al Erkel](#)
To: [Shawna Parks](#); [Conor Kennedy](#)
Cc: [Patsy Van Dyke](#); [Janeen Steel](#); [Melissa Riess](#); [Stuart Seaborn](#)
Date: Tuesday, March 10, 2020 4:16:48 PM
Attachments: [189A9E14-783C-49C9-917B-2E65992697BF\[1\].png](#)

Below is a list of Bates ranges for the Doe students' SST files:

- Doe #1: 8890-8919
- Doe #2: 8920-8949
- Doe #3: 8950-8964
- Doe #4: 8965-8989
- Doe #5: 8990-9015
- Doe #6: 9016-9039
- Doe #7: 9040-9064
- Doe #8: 9065-9079
- Doe #9: 9080-9107
- Doe #10: 9108-9122
- Doe #11: 9123-9143
- Doe #12: 9144-9162
- Doe #13: 9163-9176
- Doe #14: 9177-9193
- Doe #15: 9194-9204
- Doe #16: 9205-9213
- Doe #17: 9214-9224
- Doe #18: 9225-9237
- Doe #19: 9238-9246
- Doe #20: 9247-9256
- Doe #21: 9257-9265
- Doe #22: 9266-9273
- Doe #23: 9274-9281
- Doe #24: 9282-9291
- Doe #25: 9292-9298
- Doe #26: 9299-9306
- Doe #27: 9307-9312
- Doe #28: 9313-9319
- Doe #29: 9320-9324
- Doe #30: 9325-9328



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From: Shawna Parks <sparks@parks-law-office.com>

Date: Tuesday, March 10, 2020 at 1:36 PM

To: Albert Erkel <aerkel@ghslaw.com>, Conor Kennedy <ckennedy@ghslaw.com>

Cc: Patsy Van Dyke <patsy@learningrights.org>, Janeen Steel <janeen@learningrights.org>, Melissa Riess <mrriess@dralegal.org>, Stuart Seaborn <sseaborn@dralegal.org>

Subject: JR v. OSD, Following up on scheduling

Al and Conor, I wanted to circle back on a number of outstanding scheduling issues:

1. MSJ Briefing schedule: Plaintiffs propose a hearing date of July 13th. Replies due June 15th and oppositions due May 18th.
2. Ruiz: Plaintiffs are willing to postpone the Ruiz deposition, but please provide a date within the next two weeks to reschedule. We can accommodate pretty much any location where we can schedule a court reporter and have a video link.
3. Ruiz files: We received the production of the Ruiz files, but are having difficulty delineating where one file stops and another begins as there are no pseudonyms used or markers between the files, such as tabs or blank pages. Can you please provide us with the bates range for each file asap? If you just want to use Dr. Ruiz's chart and give the bates range for her numbered students that is fine.
4. Parker Deposition: As we have told Defendants previously, Dr. Parker is available for deposition any day March 24-27 in Sacramento. Can you please confirm a day so that we can

lock down arrangements?

5. Elliott Deposition: Also as previously sent, Dr. Elliott is available March 15-16 Tampa FL; March 29th - Los Angeles - on a 5pm Flight to SFO so before can work; April 5 Tampa. Can you confirm whether you are proceeding on one of these dates?

6. Additional plaintiffs' experts: It is unclear whether Defendants want deposition dates for Flores and Leone. Can you please confirm whether you are in fact seeking their depositions?

7. Plaintiffs' nonretained experts: Please let us know if you intend to depose Plaintiffs' nonretained experts and we will be happy to facilitate the scheduling.

8. Defendants' experts: Please provide deposition dates and locations for Manwarig and Neustadt.

Thank you,
Shawna

Shawna L. Parks

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